



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

April 15, 2009

Mr. Scott Whitelaw
Texas Brine Company Saltville, LLC
4800 San Felipe
Houston, TX 77056

Dear Mr. Whitelaw:

EPA Region III Underground Injection Control (UIC) Program staff have completed their review of the completion report and its attachments, submitted under EPA UIC permit VAS3G931BSMY, for the Saltville, Virginia Development, for the following injection well:

Injection Well #1

Verbal authorization to commence injection into this well was granted on March 25, 2009. The completion report is acceptable and this letter formally authorizes you to commence injection into this well in accordance with the conditions stipulated in your permit. Please make sure that all annuli in the well are continuously monitored for pressure and the well is designed to be automatically shut-in if the maximum operating pressure is exceeded.

If you should have any questions, please give me a call at 215-814-5464.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Stephen Platt", is written over a horizontal line.

S. Stephen Platt
Ground Water & Enforcement Branch (3WP22)
Office of Drinking Water & Source Water Protection

cc: David Asbury
DMME, Division of Gas and Oil



Steve Platt/R3/USEPA/US

03/25/2009 11:40 AM

To swhitelaw@unitedbrine.com

cc Dave Rectenwald/R3/USEPA/US@EPA

bcc

Subject Authorization for Well #1

Scott,

I reviewed the completion report information that was sent in to the office. Everything is in order and you are hereby granted verbal authorization to commence injection into Well #1 under the conditions stipulated in your permit. Please make sure that all open annuli in the well are continuously monitored for pressure and the well is set-up to be shut in automatically if the maximum operating pressure is exceeded. Quarterly reporting will now be required for this well. I'll follow-up with a formal authorization to inject letter.

S. Stephen Platt
U.S. EPA, Region 3
Ground Water & Enforcement Branch (3WP22)
1650 Arch Street
Philadelphia, PA 19103
215-814-5464



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

JUN 9 1997

Ms. Lydia Sinemus
Virginia Gas Pipeline Company
200 East Main Street
Abingdon, VA 24210

Dear Ms. Sinemus:

Per your request, enclosed are several "Annual
Disposal/Injection Well Monitoring Report," forms your use.

Please feel free to contact me at (215) 566-5454 if I can
assist you further.

Sincerely,

Lillie R. Ellerbe

Lillie R. Ellerbe
Permits Coordinator
Safe Drinking Water Act Branch (3WP32)
Office of Compliance and Enforcement

Enclosures





P.O. Box 2407 • Abingdon, VA 24212 • 540-676-2380 • Fax 540-676-0151

July 31, 1996

Steve Platt
SDWA Branch (3WP32)
Office of Compliance and Enforcement
841 Chestnut Street
Philadelphia, PA 19107

RE: EPA Permit No. VA3G11931SMY; Virginia Gas Co., EH-131;
Noncompliance to Permit Conditions.

Dear Mr. Platt:

As per our conversation yesterday afternoon on July 30, I am sending you this written notice of noncompliance to our permit conditions to Permit Number VA3G11931SMY. The EH-131 well began to experience stability problems on Saturday, July 27th while drilling the 14 3/4" hole at a depth of 1378'. Due to the large amount of fresh water that was encountered between 485' and 721', it was determined that the 11 3/4" casing should be set at this time to provide the necessary stabilization, and to minimize any groundwater contamination.

The following changes to our permit conditions were necessary:

- 1) No GR/TEMP/CAL/DIL open hole logs were run because loss of the logging tools in the open hole might have resulted.
- 2) The 11 3/4" casing was set at 1328'. We had previously planned on setting this string at $\pm 1600'$.

Anticipated Changes:

The setting depth of our 8 5/8" casing string may be affected. Planned depth was 4000'; however, it may become necessary to set this string earlier if conditions dictate.

We will keep you informed as our EH-131 well progresses. Please feel free to call me at the Abingdon office (540) 676-2380 or on location at Saltville (540) 496-7004 if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "A W Mueller".

A. W. Mueller
Virginia Gas Company



P.O. Box 2407 • Abingdon, VA 24212 • 540-676-2380 • Fax 540-676-0151

July 22, 1996

Steve Platt
SDWA Branch (3WP32)
Office of Compliance and Enforcement
841 Chestnut Street
Philadelphia, PA 19107

RE: EPA Permit No. VA3G1I931SMY; Virginia Gas Co., EH-131;
Noncompliance to permit conditions.

Dear Mr. Platt:

As I indicated by voice mail messages on July 17 and July 18, we experienced hole stability problems while drilling the 26" hole from surface to 525' in our EH - 131 well which necessitated some changes to our permit conditions. These problems were also reviewed with you earlier this morning on the phone. This letter will summarize the revisions to our casing and logging program and some future revisions which we anticipate.

The EH-131 was spudded on 7/2/96. After setting 28" at 73' KB depth, the 26" hole was drilled which encountered an additional 10' red clay zone below the conductor pipe. The clay began to slough into the wellbore and drilling was halted at 127'. The hole was grouted back with 240 sks. of cement up into the 28" and drilling resumed the next day. The 26" hole reached a TD of 525' on 7/13/96. While tripping out of the hole with the bit, hole stability problems caused by the red clay from above caused the bit to get stuck. It was finally retrieved on 7/16/96 and an attempt was made to reenter the wellbore and cleanout to bottom. Several attempts to get below 359' were unsuccessful and the bit became stuck again at 340'. The bit was again retrieved on 7/18/96 and an attempt was made to run the 22" casing. A hole restriction at 83' prevented the 22" from going any deeper. Attempts were made to remove the restriction, but they also were unsuccessful. Because of these conditions, the following changes were necessary:

- 1) No GR/TEMP/CAL logs were run because of unstable hole problems. The risk was very high that a loss of the logging tools in the open hole might have resulted.
- 2) The surface casing is 16" O.D. casing instead of 22" O.D. and it is set at 318' KB depth instead of 500'. Hole bridging and caving prevented the casing from setting any deeper. A fresh water zone with a 2" stream was drilled at 485' and minor short-term localized contamination may result. This zone will be cased and cemented off when our next string of pipe is run.

Anticipated Changes:

- 3) 11 3/4" casing instead of 16" will be set 100' below the Saltville Fault to isolate all freshwater zones above. This string is expected to be set at $\pm 1600'$ and it will be cemented back to surface.
- 4) It is anticipated that it may be necessary to circulate the wellbore with bentonite mud to clean the hole efficiently before tripping out the bit. With a fluid in the wellbore, it may not be possible to obtain a true base formation temperature to compare the cased hole temperature log against.

We will keep you informed as our EH-131 well progresses. Please feel free to call me at the Abingdon office (540) 676-2380 or on location at Saltville (540) 496-7004 if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. W. Mueller".

A. W. Mueller
Virginia Gas Company